

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : BANKRUPTCY NO. 15-11089TPA  
:  
JEFFREY MARTIN FELDMILLER and :  
SANDRA LEE FELDMILLER, his wife : HON. THOMAS P. AGRESTI  
Debtors :  
:  
DITECH FINANCIAL, LLC., : CHAPTER 13  
Movant :  
v. : RELATED TO CLAIM NO. 4-1  
:  
JEFFREY MARTIN FELDMILLER and :  
SANDRA LEE FELDMILLER, his wife; and :  
RONDA J. WINNECOUR, ESQUIRE, :  
CHAPTER 13, :  
Respondents :

DECLARATION

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY  
& KROTO, INC.

By /s/Michael S. JanJanin  
Michael S. Jan Janin, Esq.  
Pa. I.D. No. 38880  
2222 West Grandview Boulevard  
Erie, PA 16506-4508  
Phone: (814) 833-2222, Ext. 1045  
Phone: (814) 314-1051 (Direct)  
Fax: (814) 833-6753  
Email: [mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)  
#1003744  
Attorneys for Debtors, Jeffrey Martin Feldmiller and  
Sandra Lee Feldmiller, his wife

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CHAPTER 13, :  
Respondents :  
:

**CERTIFICATE OF SERVICE OF DECLARATION**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on November 16, 2016.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification.

Ronda Winnecour, Esquire, Chapter 13 Trustee  
**Via the CM/ECF system - cmevf@chapter13trusteewdpa.com**

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: November 16, 2016

By: /s/Michael S. JanJanin  
Signature

Michael S. Jan Janin, Esq.  
Typed Name

2222 W. Grandview Blvd., Erie, PA 16506-4508  
Address

(814) 833-2222 ext. 1045  
Phone No.

PA ID #38880  
List Bar I.D. and State of Admission